



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

---

LKG/KCB  
F.# 2018R01984

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 5, 2020

**By ECF and Email**

John Diaz, Esq., *Attorney for Herman Blanco*  
Michael Hueston, Esq., *Attorney for Herman Blanco*  
Michael Bachrach, Esq., *Attorney for Herman Blanco*  
Kevin Keating, Esq., *Attorney for Arthur Codner*  
Avraham Moskowitz, Esq., *Attorney for Arthur Codner*  
Donald duBoulay, Esq., *Attorney for Jason Cummings*  
Althea Seaborn, Esq., *Attorney for Jason Cummings*  
Bruce Koffsky, Esq., *Attorney for Jason Cummings*  
Alex Huot, Esq., *Attorney for Alfred Lopez*  
Mark DeMarco, Esq., *Attorney for Alfred Lopez*  
Bobbi Sternheim, Esq., *Attorney for Alfred Lopez*  
Robert Soloway, Esq., *Attorney for Kalik McFarlane*  
Kenneth Montgomery, Esq., *Attorney for Kalik McFarlane*  
Anthony Cecutti, Esq., *Attorney for Branden Peterson*  
David Ruhnke, Esq., *Attorney for Branden Peterson*  
Michael Marinaccio, *Attorney for Himen Ross*  
Elizabeth Macedonio, *Attorney for Himen Ross*  
Jeffrey Pittell, Esq., *Attorney for Julian Snipe*  
Thomas Ambrosio, Esq., *Attorney for Julian Snipe*  
Carine M. Williams, Esq., *Attorney for Bushawn Shelton*  
Susan Marcus, Esq., *Attorney for Bushawn Shelton*  
Natali J. H. Todd, Esq., *Attorney for Bushawn Shelton*  
Henry Mazurek, Esq., *Attorney for Anthony Zottola, Sr.*  
Evan Lipton, Esq., *Attorney for Anthony Zottola, Sr.*  
Ilana Haramati, Esq., *Attorney for Anthony Zottola, Sr.*  
Andrew Patel, Esq., *Attorney for Anthony Zottola, Sr.*

Re: United States v. Blanco, et al.  
Criminal Docket No. 18-609 (S-2) (RJD)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the below-listed supplemental discovery with respect to the above-captioned case. You may obtain the discovery, which will be available shortly, by contacting John Palermo

at Dupe Coop at (973) 895-1359. The government renews its request for reciprocal discovery from the defendants.

<b>Bates Stamp</b>	<b>Description</b>
BLANCO ET AL 019350- BLANCO ET AL 019425	A judicially-authorized search warrant, including an affidavit sworn in support of that warrant, designated as “Protected Materials” pursuant to the protective order entered in this case on January 18, 2019 (“Protective Order”)
BLANCO ET AL 019426- BLANCO ET AL 019450	Cellular telephone extractions of phones recovered, and searched pursuant to search warrants, from Shelton’s residence in connection with his arrest on October 11, 2018 (1B55), from Lopez’s residence in connection with his arrest on June 18, 2019 (1B101, 1B102 and 1B106), from Snipe’s residence in connection with his arrest on June 18, 2019 (1B158, 1B159, 1B165, 1B167, 1B168, 1B169, 1B170, 1B172, 1B174 and 1B175), from Blanco in connection with his parole arrest on October 4, 2018 (1B7), from McFarlane in connection with his arrest on December 18, 2018 (1B82 and 1B83); an extraction of a SIM card recovered, and searched pursuant to a search warrant, from Shelton’s residence on October 11, 2018 (1B32); a forensic image of a Macbook laptop recovered, and searched pursuant to a search warrant, from Lopez’s residence on June 18, 2019 (1B108); a forensic image of a Hewlett Packard laptop recovered, and searched pursuant to a search warrant from Snipe’s residence on June 18, 2019 (1B161); a forensic image of an RCA tablet recovered, and searched pursuant to a search warrant from Snipe’s residence on June 18, 2019 (1B171); a cellular telephone extraction of Sylvester Zottola’s phone, designated as “Protected Materials” pursuant to the Protective Order (1B94); and a cellular telephone extraction of a phone recovered from the Metropolitan Detention Center (1B100)
BLANCO ET AL 019455- BLANCO ET AL 019456	Instagram records for the following accounts: Go33Red and Tip_2x, designated as “Protected Materials” pursuant to the Protective Order
BLANCO ET AL 019457- BLANCO ET AL 019458	Screenshots of the Facebook page for A.Zottola Construction, LLC
BLANCO ET AL 019451- BLANCO ET AL 019454; BLANCO ET AL 019459	Screenshots from the Instagram page stayrich_ent dated October 25, 2018

<b>Bates Stamp</b>	<b>Description</b>
BLANCO ET AL 019460- BLANCO ET AL 019480	Laboratory reports related to the menacing of Sylvester Zottola with a firearm on November 26, 2017 and the recovery of a firearm, hat, mask and gloves from a van on June 12, 2018
BLANCO ET AL 019481- BLANCO ET AL 019483	Video surveillance related to the home invasion of Sylvester Zottola on December 27, 2017
BLANCO ET AL 019484- BLANCO ET AL 019502	Photographs of a cabana and shed, as well as New York City Police Department paperwork designated as "Protected Materials" pursuant to the Protective Order, pertaining to the burglary of Sylvester Zottola's residence on April 15, 2018
BLANCO ET AL 019503- BLANCO ET AL 019508	License plate records pertaining to an NYPD report previously produced at Bates-stamp BLANCO ET AL 000227
BLANCO ET AL 019509- BLANCO ET AL 019510	Video surveillance related to the menacing of Sylvester Zottola with a firearm on June 12, 2018
BLANCO ET AL 019511- BLANCO ET AL 019515	Law enforcement reports related to an arrest on June 12, 2018
BLANCO ET AL 019516	Video surveillance pertaining to the July 11, 2018 non-fatal shooting of Victim-2
BLANCO ET AL 019517- BLANCO ET AL 019567; BLANCO ET AL 019791- BLANCO ET AL 019792	911 calls and reports, laboratory reports and telephone records and text message correspondence with the registered owner of the red Nissan and another individual, pertaining to the July 11, 2018 non-fatal shooting of Victim-2, designated as "Protected Materials" pursuant to the Protective Order
BLANCO ET AL 019568	A 911 call report dated August 13, 2018
BLANCO ET AL 019569- BLANCO ET AL 019575	Invoices pertaining to a 2006 Ford Crown Victoria
BLANCO ET AL 019576- BLANCO ET AL 019595	A copy of Sylvester Zottola's will, designated as "Protected Materials" pursuant to the Protective Order
BLANCO ET AL 019596- BLANCO ET AL 019613	Inventory lists of items seized pursuant to search warrants from Lopez's residence; Zottola's residence; Codner's residence; Shelton's residence and car; Snipe's residence; a red Nissan Altima; and a white Nissan Altima

<b>Bates Stamp</b>	<b>Description</b>
BLANCO ET AL 019614	Data obtained pursuant to judicially-authorized pen register and trap and trace devices
BLANCO ET AL 019615- BLANCO ET AL 019788	Photographs and logs from the search of Shelton's residence on December 14, 2018, and a report pertaining to a firearm seized from Shelton's residence in connection with his arrest on October 11, 2018
BLANCO ET AL 019789- BLANCO ET AL 019790	Copies of documents seized from Zottola's residence in connection with his arrest on June 17, 2019
BLANCO ET AL 019793- BLANCO ET AL 019805	Miscellaneous financial records, designated as "Protected Materials," pursuant to the Protective Order
BLANCO ET AL 019806	Photograph of computer that depicts the video surveillance angles at 1601 Bassett Avenue
BLANCO ET AL 019807- BLANCO ET AL 019829	Bills and payment for security services, designated as "Protected Materials" pursuant to the Protective Order
BLANCO ET AL 019830- BLANCO ET AL 019833	Music videos portraying Codner

BLANCO ET AL 019834- BLANCO ET AL 019848	Text message correspondence with, and telephone numbers identified as belonging to, Lopez, designated as “Protected Materials” pursuant to the Protective Order
BLANCO ET AL 019849- BLANCO ET AL 019962	Documents, photographs and correspondence pertaining to work performed on property located at 606 Ashford Street, Brooklyn, New York, portions of which are designated as “Protected Materials” pursuant to the Protective Order

Very truly yours,

SETH D. DUCHARME  
Acting United States Attorney

By: \_\_\_\_\_ /s/  
Lindsay K. Gerdes  
Kayla Bensing  
Assistant U.S. Attorneys  
(718) 254-6155/6279

cc: Clerk of the Court (RJD) (by ECF) (without enclosures)